REMARKS

The Office Action dated February 20, 2004 has been reviewed and carefully considered. <u>Claim 2 has now been redrafted into independent form</u>. Claims 1-3 remain pending and are independent. Claims 1 and 3 have been amended. Reconsideration of the above-identified application, as amended and in view of the following remarks, is respectfully requested.

Claims 1-3 stand rejected under 35 U.S.C. 102(e) as anticipated by U.S. Patent No. 6,108,039 to Linzer et al. ("Linzer").

Claim 2, which has now been redrafted into independent form, recites, "said step of generating a plurality of test vectors from the selected vector (d^1) includes the step of adding -1, 0, or +1 to each component of the selected vector (d^1)." This inventive refinement to an approach in the prior art is discussed in the specification (e.g., page 5, lines 9-15).

The last sentence of item 3 of the Office Action offers no citation to Linzer for disclosure of present inventive approach of claim 2, but seems to suggest that Linzer adds zero to each component. For example, if one were to place a component value on one input to an adder and were to hard-wire the other input as zero-valued, one conceivably could imagine adding zero to each component. There does not appear, however, to be any reason for creating such an embodiment. Nor does Linzer disclose or suggest such an embodiment. Accordingly, Linzer fails to anticipate claim 2 for at least these reasons. Reconsideration and withdrawal of the rejection is respectfully requested.

Claim 1 as amended recites:

A recursive motion vector estimation method, comprising the steps of:
a) for a current block of a picture divided into a plurality of blocks, and based on motion information generated for the previously-processed block if any and if immediately to the left of said current block, the blocks being processed by said method in a predetermined order, generating (E) a plurality of candidate vectors from stored vectors (PV);
b) selecting (E) one of these candidate vectors to generate a selected vector (d^1);
c) generating (REF) a plurality of test vectors from the selected vector (d^1);
d) selecting (REF) one of the test vectors to generate an output vector (d^2);
e) storing (MEM) the output vector (d^2); and
f) re-executing steps a) through f) for a next-to-be-processed block, if any, as said current block.

Support for the amendment of claim 1 is found in the specification (e.g., page 4, lines 10-11; page 6, lines 8-12; page 9, lines 8-10).

Linzer fails to disclose or suggest at least steps a) and f), and is believed to be patentable over Linzer for at least this reason.
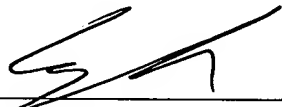
Claim 3 is an apparatus claim based on method claim 1, and is likewise deemed to be patentable.

Amendment
Serial No. 09/455,662

Docket No. PHN 17,446

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

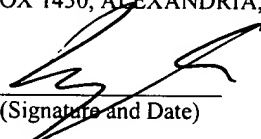Russell Gross
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